

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA) **CR NO. 13-CR-10200-GAO**
) **FILED UNDER SEAL**
v.) **EX PARTE**
)
DZHOKHAR A. TSARNAEV)

GOVERNMENT'S SEALED EX PARTE MOTION TO SEAL

The United States of America, by and through United States Attorney Carmen M. Ortiz, and Assistant United States Attorneys ("AUSA") Aloke Chakravarty, William Weinreb, Nadine Pellegrini and Donald Cabell for the District of Massachusetts, seeks leave to file the attached documents, **UNDER SEAL** and ***EX PARTE***, pursuant to the Court's Procedural Order Regarding Filing of Matters Under Seal (Dkt. 100).

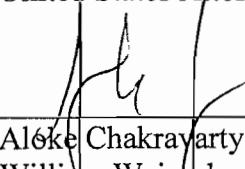
As reasons therefore, the United States of America states that the attached documents contain and refer to classified information. Because of the sensitivities made plain in the documents, including the classified information, it is properly dealt with *ex parte* and under seal until or unless the court orders. Disclosure of the government's submission would tend to disclose the existence of information which the government is not at liberty to discuss, and which may not be further implicated. Because of the serious risk of harm caused by the inadvertent or unauthorized disclosure of classified information, the government asks that the court proceed cautiously regarding the disclosure of information which could tend to disclose classified materials.

Wherefore, these facts justify the filing of the attached documents *ex parte* and under seal.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By:


Aléke Chakravarty
William Weinreb
Nadine Pellegrini
Donald Cabell
Assistant United States Attorneys

Date: October 10, 2014